

1 Daniel J. Kelly (Bar No. 145088)
2 Nairi Chakalian (Bar No. 212976)
3 HAIGHT BROWN & BONESTEEL LLP
4 71 Stevenson Street, 20th Floor
5 San Francisco, California 94105-2981
Telephone: 415.546.7500
Facsimile: 415.546.7505

5 Attorneys for Defendant NEWPORT NEWS
SHIPBUILDING AND DRY DOCK COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

21 TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
22 NORTHERN DISTRICT OF CALIFORNIA:

23 PLEASE TAKE NOTICE that on July 29, 1991, the Judicial Panel on Multidistrict
24 Litigation in *In re Asbestos Products Liability Litigation (VI)*, MDL Docket No. 875,
25 entered an order transferring all asbestos cases pending in federal court to the United States
26 District Court for the Eastern District of Pennsylvania, for coordinated or consolidated
27 pretrial proceedings pursuant to 28 U.S.C. §1407 (“MDL Transfer Order”). The MDL
28 Transfer Order also applies to “tag-along actions”, i.e., those actions involving common

1 questions of fact filed after the January 17, 1991 filing of the Panel's Order to Show
2 Cause.

3 MDL Rule 13(e) provides as follows:

4 Any party or counsel in actions previously transferred under Section 1407 or
5 under consideration by the Panel for transfer under Section 1407 shall notify
the Clerk of the Panel of any potential "tag-along actions" in which that
party is also named or in which that counsel appears.
6

7 The undersigned hereby notifies this Court that this case is a potential "tag-along
8 action" which may be subject to transfer to the Eastern District of Pennsylvania. The
9 Clerk of the Panel may either (1) enter a conditional transfer order pursuant to MDL Rule
10 12(a), or (2) file an Order to Show Cause why the action should not be transferred pursuant
11 to MDL Rule 13(b).

12 Dated: June 30, 2008

HAIGHT BROWN & BONESTEEL LLP

13 By: _____
14

15 Daniel J. Kelly
Nairi Chakalian
16 Attorneys for Defendant
17 NEWPORT NEWS SHIPBUILDING
18 AND DRY DOCK COMPANY
19
20
21
22
23
24
25
26
27
28